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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	SIPA LIQUIDATION  Adv. Pro. No. 08- 01789 (BRL)  (Substantively Consolidated)
In re:  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,  Plaintiff,  v.  SONJA KOHN, et al.,  Defendants.	Adv. Pro. No. 10- 5411 (BRL)  No. 11 Civ. 1181 (JSR)  ECF Case  Electronically Filed

**NOTICE OF MOTION OF DEFENDANTS  
UNICREDIT S.p.A. AND PIONEER GLOBAL ASSET MANAGEMENT S.p.A.  
TO DISMISS COUNTS 1, 2, 20, 21 AND 22 OF THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Motion To Dismiss of Defendants UniCredit S.p.A. ("UCG") and Pioneer Global Asset Management S.p.A. ("PGAM") (collectively, the "UCG Defendants"), dated July 25, 2011; the Declaration of Marco E. Schnabl, dated July 25, 2011, including the exhibits annexed thereto; and all the papers filed and proceedings had herein, the UCG Defendants respectfully move this Court before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, for entry of an order, pursuant to Rules 8, 9(b), 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing with prejudice Counts 1, 2, 20, 21 and 22 of the Amended Complaint in the above-captioned proceeding.

PLEASE TAKE FURTHER NOTICE that in accordance with the schedule set by the Court, moving papers from the UCG Defendants will be filed and served by July 25, 2011; opposition papers from plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC ("Plaintiff") and the Securities Investor Protection Corporation shall be filed and served by August 29, 2011; and reply papers from the UCG Defendants shall be filed and served by September 12, 2011. Oral argument before the Court will be held on September 19, 2011 at 4:30 P.M.

WHEREFORE, the UCG Defendants request that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: July 25, 2011  
New York, New York

Respectfully submitted,

SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP

/s/ Marco E. Schnabl

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